IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

YASMIN DIAZ,

CIVIL DIVISION

Plaintiff,

No. 16-179

v.

AMORE LIMITED PARTNERSHIP d/b/a AMORE MANAGEMENT COMPANY,

Defendant.

JURY TRIAL DEMANDED

<u>DEFENDANT AMORE LIMITED PARTNERSHIP d/b/a AMORE MANAGEMENT</u> <u>COMPANY'S MOTION FOR SUMMARY JUDGMENT</u>

Defendant, Amore Limited Partnership d/b/a Amore Management Company, by and through its attorneys and pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Rule 56.1, files this Motion for Summary Judgment. Defendant respectfully requests that this Court grant the Motion for Summary Judgment and enter judgment in favor of Defendant and against Plaintiff. A Memorandum of Law in Support is filed contemporaneously with this Motion and is incorporated by reference as if fully rewritten herein. Defendant's Concise Statement of Undisputed Material Facts and Appendix of Exhibits is also incorporated as if fully rewritten herein.

Respectfully Submitted,

ROBB LEONARD MULVIHILL LLP

Dated: March 27, 2017

/s/ Rhonda J. Sudina
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Counsel for Defendant